

# **EXHIBIT 13**

Waymo LLC v. Uber Technologies, Inc., et al., No. 3:17-cv-00939-WHA (N.D. Cal.)  
Defendants’ Privilege Log Associated with March 31, 2017 Production of Documents

INDEX NO.*,**	AUTHOR(S) OF DOCUMENT	RECIPIENT(S) OF DOCUMENT <sup>1</sup>	DATE OF DOCUMENT	SUBJECT MATTER	NATURE OF PRIVILEGE	LOCATION WHERE DOCUMENT WAS FOUND	BASIS FOR UBER’S ASSERTION OF PRIVILEGE	AFFIRMATION OF STEPS TAKEN TO ENSURE CONFIDENTIALITY AND NON-RECEIPT BY UNAUTHORIZED PERSONS
1	Stroz Friedberg, LLC	Morrison & Foerster LLP (outside counsel for Uber) O’Melveny & Myers LLP (outside counsel for Otto) Donahue Fitzgerald LLP (outside counsel for Levandowski) Levine & Baker LLP (outside counsel for Lior Ron)	August 5, 2016	Summary Report by Stroz Friedberg, LLC (“Investigation Report”) Regarding Investigation Relating to Acquisition of Ottomotto by Uber (the “Due Diligence Investigation”).	AC / WP/JI <sup>2</sup>	Uber In-House Counsel	Investigation report prepared at direction of counsel for Uber for purposes of providing legal advice to Uber, in anticipation of litigation, re: due diligence in connection with potential acquisition of Ottomotto.	Uber affirms that to its knowledge no unauthorized persons have received the Investigation Report. Specifically, to Uber’s knowledge the only recipients of this document are the original recipients—those listed in the Recipient(s) column—and Uber’s in-house counsel, Ottomotto’s in-house counsel, and Outside Counsel of Record in this litigation. Pursuant to a common interest agreement dated April 11, 2016 and entered into by counsel for Uber, counsel for Ottomotto, counsel for A. Levandowski, and counsel for Lior Ron, the recipients of the Investigation Report (including its attachments) were contractually obligated to not disclose it to any other persons except for in-house counsel for Uber, in-house counsel for Ottomotto, outside counsel for those entities, outside counsel for A. Levandowski, and outside counsel for Lior Ron.
2	Stroz Friedberg, LLC	Morrison & Foerster LLP (outside counsel for Uber) O’Melveny & Myers LLP (outside counsel for Otto) Donahue Fitzgerald LLP (outside counsel for Levandowski) Levine & Baker LLP (outside counsel for Lior Ron)	March 21, 2016	Attachment to Investigation Report. Memorandum regarding investigation protocol for the Due Diligence Investigation.	AC / WP/JI	Uber In-House Counsel	Attachment to Investigation Report. Memorandum prepared as part of investigation conducted at direction of counsel for Uber for purposes of providing legal advice to Uber, in anticipation of litigation, re: due diligence in connection with potential acquisition of Ottomotto.	[same as Index No. 1]

<sup>1</sup> Individuals from each entity identified as an author or recipient are listed on page 17, as are recipients from Uber and Otto.  
<sup>2</sup> The invocation of the privileges on this log are pursuant to the “Joint Defense, Common Interest, and Confidentiality Agreement” filed with the Court with Anthony Levandowski’s motion, filed on April 4, 2017.

\*With respect to memoranda/reports marked with a single asterisk, the reports themselves (which, on their own, constitute work product) are undated. The date of the report/memorandum listed in this log is the date of the Investigation Report.  
  
\*\*With respect to documents marked with two asterisks, the date of the document in this log is listed as the date of the Investigation Report, as it is the selection for and inclusion in that report that forms the basis for the assertion of work product privilege. The author of these documents is listed as Stroz Friedberg, LLC because it is the entity who selected the documents for inclusion in the Investigation Report. The author of the underlying communication(s)/document(s) is not listed in this privilege log because doing so would reveal the work product over which privilege is being asserted.